

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MUSTAFA ABDULLAH, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CASE NO. 4:14-cv-1436
	)	CDP
COUNTY OF SAINT LOUIS, MISSOURI, et al.,	)	
	)	
Defendants.	)	
_____	)	

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING  
THE ENTRY OF A PERMANENT INJUNCTION**

Plaintiffs Mustafa Abdullah, Natasha Gray, Deray Mckesson, and Robert Hudgins (“Plaintiffs”), Defendant Ronald K. Replogle, in his official capacity as Superintendent of the Missouri State Highway Patrol, and Defendant the County of St. Louis, Missouri (with Mr. Replogle, the “Defendants”), by and through their respective counsel, hereby stipulate as follows:

1. On October 6, 2014, this Court granted Plaintiff Mustafa Abdullah’s Motion for a Preliminary Injunction and preliminarily enjoined Defendants “from enforcing or threatening to enforce any rule, policy, or practice that grants law enforcement officers the authority or discretion to arrest, threaten to arrest, or order to move individuals who are violating no statute or regulation and who are peaceably standing, marching, or assembling on public sidewalks in Ferguson, Missouri.” (Memorandum, Order and Preliminary Injunction (ECF No. 51) at 25).
2. Plaintiffs and Defendants hereby agree and stipulate that (a) the attached proposed order regarding entry of a permanent injunction shall be entered; (b) Plaintiffs are entitled to

recover reasonable costs and fees; (c) the amount of Plaintiffs' reasonable recoverable costs and attorney hours incurred shall be briefed to and decided by this court; (d) the issue of whether the local or Los Angeles rates will apply to calculate the recoverable fees associated with the attorney hours billed by those of Plaintiffs' attorneys from the law firm Munger, Tolles & Olson LLP shall be briefed to and decided by this Court; and (e) that the entry of the following proposed order shall occur as soon as this Court deems proper and is not subject to or conditioned on this Court's decisions regarding Plaintiffs' reasonable costs, attorneys' hours, and rates.

**IT IS SO STIPULATED**

DATED: December 19, 2014

Respectfully submitted,

/s/ Anthony E. Rothert  
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### **Certificate of Service**

I hereby certify that on December 19, 2014, a copy of the foregoing was served on counsel of record by operation of the ECF/CM system.

/s/ Anthony E. Rothert